

4. CODES OF CONDUCT

Conflict of Interest and Disclosure Policies

4.1 Conflict of Interest

SeeD staff on employment contracts are not permitted to take up a second job which may impede their ability to carry out SeeD duties.

SeeD Consultants can provide and charge for their professional services to other organizations (clients) provided that this takes place outside of the time dedicated for their collaboration with SeeD.

Consultants, regardless of their Level of Engagement, are expected to use their professional judgement and exercise integrity to avoid conflicts of interest (COI) with regards to their contractual obligations to SeeD. Consultants are expected to disclose other work being conducted with any organisation which is deemed to be a competitor for SeeD's signature services: calculating indexes which measure social change, resilience, conflict and peace. In this case consultants agree to resolve potential conflicts of interest and if necessary, sign a non-disclosure agreement with SeeD. If the COI cannot be resolved the consultant may be requested to make a choice between a contract with SeeD or the alternative organisation.

4.2 Confidentiality

With except written authorization by SeeD, the Consultant shall not communicate with any person, government, or other entity external to SeeD any unpublished information made known to the Consultant by reason of his or her association with SeeD. The Consultant shall draw the attention of his or her staff to the confidentiality obligation resulting from the above. If SeeD authorizes the Consultant in writing to supply information on the Contract, the Consultant shall provide such information accurately.

The Consultant shall not advertise or publicize his or her association with SeeD under this Contract, nor shall the name, emblem, or official logo of SeeD be used for business or professional purposes or otherwise without the prior written approval of SeeD. Any communication relating to the Contract whether to the mass media or in any public form whatsoever (press, radio, television, cinema, Internet, etc.) shall be subject to prior authorization in writing by SeeD.

Consultants are not permitted to disclose any proprietary information to any external party, unless provided with written permission to do so from SeeD's Head of Programmes and Field Operations, the Executive Team or the Programme and Admin Officer. Any confidential information provided to consultants during the course of their work is not to be divulged either during the work agreement period or after its termination. This includes, but is not limited to the following:

- Project proposals and partnership arrangements
- Project and institution recipient information
- Financial information.
- SeeD credentials and/or login details
- Data sets
- Innovation and institutional development plans
- Research methodologies and innovations.

The above information can be shared only on very specific occasions and with the written approval, or through a Teaming Contract that stipulates it. Any violation of the confidentiality policy is subject to disciplinary action, including possible termination.

The provisions described above shall remain valid even after termination of the mandate.

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4.3 Procurement of services

SeeD consultants must disclose any financial investment or employment ties or other interest, held directly by the consultant, or by a relative, friend or acquaintance, in the provision of any goods, services, or facilities, which are being considered for purchase or use by SeeD, or which have already been purchased or are in use by SeeD. This relationship test includes any ties to projects under consideration for funding, buyers, grantees and consultants of institutions receiving assistance.

4.4. Relatives

Consultants must disclose if they are a relative or spouse of a SeeD consultant, or if they are a spouse or relative of a candidate applying for a job with our organization.

4.5 Gifts

No consultant shall accept a gift, personal loan, entertainment or other special consideration from any individual or business organization doing business with SeeD. Small gifts, of value 100 EUR or less, may be accepted for cultural reasons or special occasions. Arrangements are never to be made for unauthorized payments, transfers of any goods or use of services to or by any consultant or other individuals or organizations.

4.6 Professionalism & Standards of Behavior

It is the policy of SeeD to promote the highest level of professionalism in our methods of working. This means that all staff is expected to be diligent and thoughtful in the execution of their assignments. It also means that we will act at all times in a manner that is transparent, above suspicion, and fair.

All SeeD consultants are required to display the highest standards of personal and professional conduct at all times. Violation of this policy or other illegal or improper acts or practices by any consultant is strictly prohibited. The following examples of conduct may result in disciplinary action, including possible termination of employment. This list is not exhaustive, but it is provided to illustrate the types of conduct that are deemed unacceptable by our organization.

- Habitual absenteeism or tardiness
- Lack of cooperation with management or fellow staff members
- Willful insubordination to the supervisor or other management
- Overstaying rest or meal breaks
- Malicious, dangerous, riotous, disorderly or violent behavior or acts
- Any act to subvert the proper function of our organization
- Fraud or dishonesty, which adversely affects our consultants, or the operations or property of any persons or organizations with whom we conduct business
- Falsification of records or obtaining employment through false representation
- Verbal and/or physical harassment related to the ethnic, religious or sexual background or preference of other consultants or persons
- Making harmful degrading or defaming comments about our organization, or its programs, projects or personnel
- Misuse of our equipment including copiers, computers, vehicles, radios, telephones or other equipment, or use thereof without prior approval

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- Use of alcohol on office premises, illegal drugs or other chemicals that adversely affect job performance
- Willful or negligent loss, destruction, or theft of any property owned by our organization, its consultants or suppliers
- A receipt, distribution or exchange of bribes, gifts, gratuities or other favors involving any individual with whom we conduct business
- Engaging in any illegal acts as defined by the laws and regulations of any local or national jurisdiction in which our organization operates or travels to on business.

Staff who fail to abide by this code of professional behaviour will be subject to disciplinary measures, which could lead to termination of contract.

Protection from Discrimination, Harassment and Exploitation Policy

We are committed to establishing and maintaining a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, we expect that all relationships among persons in our employment will be professional and free of bias, prejudice and harassment. Our organization's management will make every reasonable effort to ensure that all consultants are familiar with these policies and are aware that any complaint regarding the violation of such policies will be investigated and resolved appropriately. Any consultant who has any questions or concerns about these policies is encouraged to talk with their immediate supervisor(s) or the Programme and Admin Officer.

4.7. Equal Employment Opportunity and Protected Categories

It is the policy of our organization to ensure equal employment opportunity without discrimination or harassment on the basis of any of the following "protected categories": tribal affiliation, race, color, religion, sexual orientation, age, national origin, gender, disability, marital status, or any other characteristic that may be protected by law.

4.8 Non-Retaliation

We encourage the reporting of all perceived incidents of discrimination or harassment. It is the policy and responsibility of our management to investigate any such reports. Our organization prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports. All staff is expected to comply with this policy and failure to do so could result in disciplinary action, including termination.

However, false and/or malicious complaints of harassment, discrimination or retaliation as opposed to complaints which, even if erroneous, are made in good faith, may also be the subject of appropriate disciplinary action.

4.9 Exclusion Prohibited

These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected category, in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion in order to avoid allegations of harassment. Our policies intend to prohibit any disparate treatment on the basis of gender or any other protected category, with regard to terms, conditions, and privileges of employment. The prohibitions against harassment, discrimination and retaliation are explicitly intended to complement and further those policies, not to form the basis of an exception to them.

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4.10 Definitions of Harassment, Exploitation and Abuse

The following definitions are to be used in our organization to identify those acts which may be considered harassment or exploitation. For further information on definitions of sexual harassment, exploitation and abuse, please refer to UN Glossary [here](#).

- Harassment

Under this policy, harassment is defined as any verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his /her membership or affiliation with a protected category. Affiliation with a protected category includes his/her association with relatives, friends or associates who are members of a protected category. Under this policy harassment involves actions which have the purpose or effect of: creating an intimidating, hostile or offensive work environment; unreasonably interfering with an individual's work performance; otherwise adversely affecting an individual's employment opportunities.

Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls, in vehicles, in electronic systems or elsewhere on the employer's premises, or which is otherwise circulated in the workplace.

- Sexual Harassment

Sexual harassment constitutes discrimination and is expressly forbidden by our organization. Such harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. Sexual harassment occurs when, for example: submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of behaviors, subtle and/or direct, and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; unwelcome notes, e-mails, phone calls, messages, or gifts of a sexually suggestive nature; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

4.11 Sexual Abuse and Exploitation

Linked to but differentiated from sexual harassment, "sexual abuse and exploitation¹" refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, threats of physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, profiting monetarily, socially or politically from the sexual exploitation of another, and includes exchange of payment, including goods and services in return for sexual acts.

4.12 Individuals and Conduct Covered

These policies apply to all job applicants and consultants of our organization, whether related to conduct engaged in by fellow consultants or someone not directly connected to our organization

¹ See UN Secretary-General's Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13)

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(e.g., an outside vendor, consultant or customer). Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during times of transportation, business trips, business meetings and business-related social events.

4.13 Reporting an Incident of Harassment, Discrimination or Retaliation

Our organization encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been victims of such conduct or those who have witnessed such misconduct should discuss their concerns with their immediate supervisor(s), and/or SeeD Admin Team, and/or a member of the Executive Team. We recognize that such discussions are sensitive, personal and difficult. Thus, SeeD believes it is victims' own prerogative to choose the appropriate team member they wish to disclose a case of misconduct. Once disclosed, the victim and the team member to whom the case was disclosed to are expected to follow the either informal or formal complaints procedures to ensure that appropriate actions are taken. As such, while confidentiality would be respected across all levels and procedures, this may not be the case for anonymity if a formal investigation is deemed necessary.

In addition, we encourage, but do not require that individuals who believe they have been victims of misconduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. However we recognize the underreported nature of such unwarranted and/or criminal behavior due to multiple reasons from cultural norms to intimidation, and power relations to confidentiality. Thus, an individual observing the misconduct and/or victim may prefer to pursue the matter through other informal or formal complaint procedures described below, or contact integrity@seedsofpeace.eu if they wish to remain anonymous.

Complaints Procedure

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4.14 Complaints - Informal Procedure

If for any reason an individual does not wish to address the offender directly, or if such action does not successfully end the offensive conduct, the individual should notify his/her *immediate supervisor(s) and/or the Programme and Admin Officer*, who may, if the individual so requests, talk to the alleged offender on the individual's behalf.

An individual reporting discrimination, harassment, abuse, exploitation or retaliation should be aware, however, that we may decide that the situation is serious enough that it is necessary to take action to address such conduct beyond an informal discussion. Any such decision to escalate the informal complaints procedure to a formal one will be discussed with the victim prior to taking any further action. The best course of action in any case will depend on many factors that carefully assess the needs of the victim and, therefore, the informal procedure will remain flexible. However, this informal procedure is not a required first step for the reporting, and victims and/or individuals who witness misconduct can pursue formal procedures if they wish.

4.15 Complaints - Formal Procedure

As noted above, individuals who believe they have been the victims of misconduct, or who believe they have witnessed such misconduct, should discuss their concerns with their *immediate supervisor(s) and/or a member of the Executive Team*. All formal misconduct complaints should be discussed at the Executive Team level, who will decide on the appropriate course of action in liaison with the victim. SeeD encourages the prompt reporting of complaints or concerns so that rapid and constructive action (e.g. investigation, disciplinary action, reparation) can be taken. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of preventing and resolving actual or perceived incidents of misconduct.

SeeD adopts a zero-tolerance policy and is committed to investigating any reported allegations of discrimination, harassment, abuse, exploitation or retaliation promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Complete documentation of the investigation will be prepared and copies will be kept in confidential files with locked access only by authorized personnel.

4.16 Complaints – General Handling & Disciplinary Procedure

All formal complaints would be handled on the Executive Team level in liaison with the victim, to the extent consistent with adequate investigation and appropriate corrective action. The Executive Team should discuss the case within one month of its discovery. Confidentiality will be maintained throughout the investigatory process, which should not exceed 3 months.

Retaliation against an individual for reporting any misconduct or for participating in an investigation of a claim of misconduct is a serious violation of this policy and, like the misconduct itself, will be subject to disciplinary action.

Misconduct constituting harassment or any related retaliation, will be dealt with appropriately. Within SeeD's Responsive Action Plan, victims will be put in direct contact with SeeD's Head of Learning and Innovation, Clinical Psychologist and Lecturer of Clinical Psychology at the University of Cyprus, [Dr. Alexandros Lordos](#) who will provide them with referral pathways in their country of residence (e.g. psychological or legal support, etc.) of relevant inter-agency bodies (e.g. PSEA Network, GBV/CP coordination groups) to ensure that the needs of survivors of SEA are met. Further action may also include, for example, training, referral to counseling and/or disciplinary action such as verbal warning, written reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, as determined to be appropriate under the circumstances.

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If a party to a complaint does not agree with the resolution, that party may appeal to the Board of Directors.

Disciplinary Policy & Procedures

It is our policy to apply disciplinary action only when required and at a level and manner consistent with the nature and seriousness of the infraction, which would include, but not limited to, internal discussions, investigations and/or arbitration if/when necessary. All staff are expected to conduct their activities and relationships in a manner that will generally avoid the necessity to invoke any of the disciplinary actions outlined below.

4.17 Disciplinary Process

Disciplinary actions may include: verbal warnings, written warnings, withholding of annual wage increases, withholding of promotion, reduction to a lower post, and dismissal with or without payment of any compensation in lieu of notice. SeeD reserves the right to apply any of these disciplinary actions or other legal remedies as deemed necessary. A consultant/employee may be dismissed for serious infractions without prior warning.

A verbal warning should be given for minor violations. A written warning is required for more serious violations, unless the level of seriousness requires more stringent immediate actions, such as immediate suspension or termination.

All disciplinary actions except for verbal warnings are to be recorded in the consultant's/employee's personnel file and given to SeeD's Admin Team for review and filing.

A consultant/employee has the right to contest any written warning, letter of reprimand, or other personnel disciplinary action within a period of one month from the date of the disciplinary action is issued. To do so, they must submit to SeeD's Admin Team a written response which will also be placed in his/her personnel file (see 4.12 Grievance Procedure and 4.13 Complaint Resolution below).

4.18 Grievance Procedure

It is our policy that any consultant/employee shall have the right to complain about any work situation which they consider to be unfair by using the established Grievance Process below.

4.19 Grievance Process

The consultant/employee must first speak with their supervisor(s) and/or SeeD's Admin Team and if the issue cannot be resolved, he/she may take the issue to the next level of management. If the issue remains unresolved, it should be escalated SeeD's Executive Team, who shall make the final decision of what action, if any, should be taken.

4.20 Complaint Resolution

It is our policy to require all of our staff team members to make every reasonable effort to resolve any questions, problems, and misunderstandings that have arisen in the workplace at the lowest possible level.

4.21 Complaint Resolution Process

Prior to initiating a formal complaint the involved parties should meet in an attempt to resolve the complaint. If this fails, the following steps should take place:

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- Complaints should be presented in writing, dated and signed by the consultant/employee and submitted to the supervisor(s) and/or SeeD's Admin Team (see below for the recommended order of submission).
- A meeting should be arranged by SeeD's Admin Team with all of the concerned team members (e.g. complainant, supervisor(s) to discuss the complaint.
- All documentation of the facts and other information related to the complaint should be assembled in advance of this meeting by SeeD's Admin Team.
- If the complaint is not resolved at this meeting, the complaint should be escalated to the Executive Team level.

Consultants/employees must first direct all questions, problems and queries to their direct supervisor(s) and SeeD's Admin team. However, if the matter is unresolved, or the problem is directly concerning the direct supervisor(s), the issue should be brought to SeeD's Executive Team. SeeD's Executive Team is available for questions or concerns involving any staff member's employment or grievances. However, the use of all the above steps is encouraged, before bringing a complaint to the Executive Team.

4.22 Witnessing of Illegal, Unsafe or Unethical Practices

SeeD is committed to the identification and remedy of any malpractice within the organization. Consultants/employees who suspect any form of malpractice, whether it should involve a criminal injustice or unsafe or unethical practices, are asked to report their observation immediately to their direct supervisor(s) and SeeD's Admin team, who will take the necessary steps to address the incident reported by the witness. Consultants/employees will not be penalized for using this procedure in strict accordance with our non-retaliation policy (See 4.7 Non-Retaliation above).

4.23 Apolitical Policy

We are a non-political organization. Therefore, none of our programs, business activities or transactions should be conducted in a manner that would potentially cause our organization to be considered political in any regard.

4.24 Smoking Policy

Our organization does not allow smoking in any company building.

4.25 Alcohol and Drug Policy

The use of alcohol in the workplace or while engaged in business outside of our premises, is allowed on specific occasions only (i.e. social gatherings for receptions, special events, business lunches/dinners). The manufacture or sale of alcohol in the workplace or while engaged in business outside of our premises, is strictly prohibited at all times.

4.26 Drug Policy

The manufacture, distribution, possession, sale, or use of any illegal substance in the workplace or while engaged in business outside of our premises, is strictly prohibited at all times.

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4.27 Personal Use of Organizational Property or Personnel

The personal use of the organization's property or services, or the use of our personnel to perform any personal non-business service, is strictly prohibited without prior written approval. This includes the personal use of items or services such as communication equipment, computers, vehicles, or mail services.

4.28 Communications Systems Policy

This policy is intended for all users of our communications systems in order to avoid any possible misuse of equipment or damage to our integrity and reputation. The use of our communications systems is restricted to official use only, except where prior arrangements have been made to reimburse our organization for any added cost related to personal use.

4.29 Personal Use Procedure

Procedures for reimbursing SeeD for the personal use of communications systems may be separately prescribed from time to time. Communications systems include, but are not limited to: radios, phones, cell phones, fax and copy machines, laptops, computers, the Internet, and express or other mail services. This policy also applies to the use of portable equipment, such as laptops, used away from our premises.

SeeD reserves the right to monitor consultant use and to retrieve the contents of communications to ensure proper use. Failure to comply with this policy may result in disciplinary action, including termination of employment. Contents of communications may be used in disciplinary or legal proceedings.

4.30 Information Systems Policy

This policy provides guidance relating to responsible use of our organization's computers and Information Systems. This policy addresses use of the Internet, e-mail, and all office equipment including but not limited to: computers, scanners, printers, projectors and digital cameras.

It is acknowledged that some SeeD staff requires access to electronic communication services and Information Technology (IT) equipment in the normal course of work. The spirit of this policy emphasizes that the use of these services is made available to primarily support SeeD related work and not private use. Failure to follow this policy may result in denial of access to these resources, or other disciplinary action, including immediate dismissal.